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REMARKS

Claims 1 - 3, 6, 7, 9 - 11, 13 - 16, 18 - 21, and 23 - 33 are pending in the present application. Claims 4, 5 and 8 were previously canceled. Claims 12, 17 and 22 are canceled by the present amendment.

Applicants are consolidating into claims 11, 16 and 21, recitals that were previously presented in claims12, 17 and 22, respectively. Additionally, Applicants are amending claims 13, 14, 18, 19, 23 and 24 for consistency with the recitals of their underlying claims. The present amendment does not introduce into the claims any subject matter that has not been previously presented to the Examiner, but instead, places the claims in better form for consideration on appeal. Accordingly, Applicants respectfully request that the Examiner **enter and consider the present amendment.**

In section 7 of the Office Action, claims 1 – 3, 6, 7 and 9 – 33 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,549,216 to Schumacher et al. (hereinafter "the Schumacher et al. patent") in view of U.S. Patent Application Publication No. 2003/0154172 to Guyan et al. (hereinafter "the Guyan et al. publication"). Claims 1, 11, 16 and 21 are independent claims. Applicants are traversing the rejection.

Claim 1 provides for a process for automatically revising data in a database of file records stored in a computer. The process includes, *inter alia*, (a) recording in a memory, a response to an event, wherein the response is performed by a human operator interacting with a graphical user interface of a computer, to form one or more emulated responses to the event, wherein the one or more emulated responses are stored in an emulated event handler, and (b) executing a task by matching a member of a collection of emulated event handlers to a given event.

The Schumacher et al. patent is directed toward a system and method for recording user interface events (col. 1, lines 19 – 21), and more particularly, recording events that result from

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user interaction with various components of an applet (col. 2, lines 15 – 16). With reference to

FIG. 2, the Schumacher et al. patent states, at col. 5, lines 45 –48:

> When a recorded sequence of events is desired for playback at a later
> time, applet event recorder 100 <u>retrieves the recorded events via Load
> button 216</u> and <u>initiates the playback with Run button</u> 212 (emphasis
> added).

Thus, in the Schumacher et al. patent, a playback of a recorded event is <u>manually initiated by a
user</u>.

The Guyan et al. publication discloses a use of event handlers (par. 0170). However,

according to the last line of paragraph 0171, such an event handler is <u>written</u>. For example,

paragraphs 0210 – 0212 disclose, and provide an example of coding for, a general error event

handler. The event handlers are disclosed as <u>handling operations that are ordinarily performed by
a computer</u>, and are further disclosed as being <u>automatically invoked by the computer</u>. For

example, a component or a controller will call the GeneralErrorHandler when it encounters any

type of unexpected or unknown error (par. 0211). <u>None of the event handlers is described as
emulating an action performed by a human operator</u>.

Applicants respectfully submit that neither of the Schumacher et al. patent nor the Guyan et

al. publication include any suggestion to be combined with one another to provide **an event
handler that emulates an action of a human.** To the contrary, whereas the Schumacher et al.

patent specifically discloses <u>playback of a recorded event being manually initiated by a user</u>, the

Schumacher et al. patent does not suggest that the recorded event is intended to be <u>automatically
invoked by a computer</u>, as are the event handlers of the Guyan et al. publication. In further

contrast, whereas the Guyan et al. publication expressly discloses that an <u>event handler is written</u>,

and whereas <u>none of the event handlers are described as emulating an action performed by a
human operator</u>, the Guyan et al. patent does not suggest that the event handlers are a result of

<u>recording events that result from user interaction</u> with various components of an applet, as

disclosed by the Schumacher et al. patent.

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Whereas neither of the Schumacher et al. patent nor the Guyan et al. publication includes any suggestion to be combined with one another, the cited combination of references **does not provide a *prima facie* case of obviousness** as a basis for a rejection of claim 1. More particularly, neither of the Schumacher et al. patent nor the Guyan et al. publication includes any **motive** to be combined with one another to provide a process that includes (a) recording a response to an event, wherein the response is **performed by a human operator** interacting with a graphical user interface of a computer, to form one or more **emulated responses** to the event, wherein the one or more emulated responses are stored in an emulated event handler, and (b) executing a task by matching a member of a collection of **emulated event handlers** to a given event, as recited in claim 1.

Whereas the cited combination of references does not provide a motive to be combined, Applicants suspect that the cited combination is a result of **hindsight reconstruction**. That is, the Office, given the benefit of the present application, has imputed a motive for the combination of references, whereas in fact, no such motive exists. Applicants respectfully submit that lacking the disclosure of the present application, a person skilled in the art would not have combined the Schumacher et al. patent and the Guyan et al. publication to yield the subject matter of claim 1.

In view of the reasoning provided above, Applicants submit that claim 1 is patentable over the cited combination of the Schumacher et al. patent and the Guyan et al. publication.

Claim 11 provides for a method that includes (a) recording in a memory, a response to an event, wherein the response is performed by a human operator interacting with a graphical user interface, (b) storing the response in an emulated event handler, and (c) employing the emulated event handler to handle the event for an obtained record.

Applicants submit that for reasoning similar to that provided in support of claim 1, the Schumacher et al. patent and the Guyan et al. publication <u>do not include any motive</u> to be

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combined with one another to provide for (a) recording a response to an event, wherein the response is performed by a human operator, (b) storing the response in an emulated event handler, and (c) employing the emulated event handler to handle the event for an obtained record, as recited in claim 11. Thus, claim 11 is patentable over the cited combination of references.

Claims 16 and 21 each include recitals similar to those of claim 11. Hence, claims 16 and 21, for reasoning similar to that provided in support of claim 11, are also patentable over the cited combination of references.

Claims 2, 3, 6, 7, 9, 10, 13 – 15, 18 – 20 and 23 – 33 depend from one of claims 1, 11, 16 or 21. As such, each of these dependent claims is also patentable over the cited combination of references.

Claims 12, 17 and 22 are canceled. Thus, the rejection of claims 12, 17 and 22 is rendered moot.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 1 – 3, 6, 7 and 9 – 33.

As mentioned above, Applicants are consolidating into claims 11, 16 and 21, recitals that were previously presented in claims 12, 17 and 22, respectively, and amending claims 13, 14, 18, 19, 23 and 24 for consistency with the recitals of their underlying claims. None of the amendments narrows the scope of any term of any of the claims, and therefore, the doctrine of equivalents should be available for all of the terms of all of the claims.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

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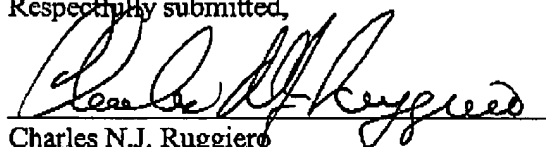Application Ser. No. 09/924,259   Art Unit 2162

Since this amendment neither raises new issues nor requires further consideration, entry is respectfully solicited. If the Examiner deems that the present amendment does not place the application in condition for allowance, **Applicants respectfully request that it be entered** for the purpose of appeal.

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Date

Respectfully submitted,

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